

November 5, 2004

Under 40 CFR Part 71.5 and Alaska regulations 18 AAC 50.326, applications for renewal of an operating permit must contain the same information and level of review as the initial application. In order to ease the renewal process, ADEC Air Permits Program will use a cross-referencing approach. The information below describes how a renewal application may refer to other documents.

Any source wishing to reference materials previously submitted must ensure that the state files still contain the referenced documents and that the referenced documents are still true, accurate, and complete.

When compiling a renewal application, remember the following:

- 1) A responsible official must certify the application according to 18 AAC 50.205. This certification must cover any referenced material as well as material provided with the renewal application.
- 2) 71.5(c) and 18 AAC 50.326 require the source to submit certain information. ***If none of the information has changed since the initial application (i.e., no new construction permits or applicable state or federal regulations)***, the source may include a page referencing the initial application and/or the current Title V Operating Permit. If the referenced application is not current, the updated or complete information must be included in the renewal application.

New requirements under 40 CFR 71.5	Previous requirements under 18 AAC 50.335	Information Required	May Reference	
			Initial Application	Current Title V Permit
71.5(a)	(a)	Application	Yes	Yes
71.5(c)(1) & (2)	(b)	Identification	Yes	Yes
71.5(c)(3) & (4)	(c)	General Emission Information	Yes	Yes
18 AAC 50.326(c) & 18 AAC 50.400	(d)	Fees	Yes	Yes
71.5(c)(5)	(e)	Regulated Emission Unit Information	Yes	No
N/A	(f)	Source-wide Information: Ambient Air Quality	Yes	Yes

New requirements under 40 CFR 71.5	Previous requirements under 18 AAC 50.335	Information Required	May Reference	
			Initial Application	Current Title V Permit
71.5(c)(7) via 71.6(a)(9)	(g)	Source-wide Information: Owner Requested Limits	Yes	Yes
71.5(c)(7) via 71.6(a)(10)	(h)	Source-wide Information: Emissions Trading	Yes	Yes
71.5(c)(8)	(i)	Compliance Information	No	No
71.5(c)(7) via 71.6(a)(9)	(j)	Proposed Terms and Conditions	Yes	Yes
71.5(c)(9)(iii)	(k)	Compliance Certifications	Yes	Yes
71.5(c)(6)	(l)	Permit Shield	Yes	Yes
71.5(c)(3)	(m)	Supporting Documentation	Yes	No
71.5(c)(5)	(n)	Additional Information	Yes	Yes
71.5(c)(9), 18 AAC 50.326(c) & 18 AAC 50.205	(o)	Certification of Accuracy and Completeness	No	No
71.5(a)(1)(iii)	(p)	Renewals	Yes	No
18 AAC 50.326(d)	(q)	Insignificant Sources	Yes	Yes
18 AAC 50.326(e)	(r)	Insignificant Sources: Emission Rate Basis	Yes	No
18 AAC 50.326(f)	(s)	Insignificant Sources: Category Basis	Yes	No
18 AAC 50.326(g)	(t)	Insignificant Sources: Size or Production Rate Basis	Yes	No
18 AAC 50.326(h)	(u)	Insignificant Sources: Case-by-Case Basis	Yes	No
18 AAC 50.326(i)	(v)	Administratively Insignificant Sources	Yes	No

- 3) If there are any requested changes to the current Title V permit, a redline/strikeout of those changes is very helpful and should be included with the renewal application submittal.

- 4) Be sure to evaluate the applicability of any State or Federal applicable requirements that have been promulgated since the initial application. This is part of the review required for every application by Part 71.
- 5) Certification by a responsible official is required in every application. Failure to include this certification will result in the application being deemed incomplete.
- 6) Submit the renewal application no sooner than 18 months and no later than six months before the permit expires, as required in 40 CFR 71.5(a)(1)(iii).
- 7) Include the permit renewal retainer as required in 18 AAC 50.400(b)(11). Failure to include the retainer will result in the application being deemed incomplete.